

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
RENOVATE AMERICA, INC., <i>et al.</i> , ¹)	
)	Case No. 20-13172 (LSS)
Debtors.)	(Jointly Administered)
)	

NOTICE OF ENTRY OF APPEARANCE AND DEMAND FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Adams and Reese LLP and Young Conaway Stargatt & Taylor, LLP hereby enter their appearance as counsel to St. John & Partners Advertising and Public Relations, Inc. in the above-captioned chapter 11 case, and request, pursuant to Bankruptcy Rules 2002 and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings in these case be given and served upon the undersigned counsel as follows:

John T. Rogerson, III
Jamie W. Olinto
ADAMS AND REESE LLP
501 Riverside Avenue, Suite 601
Jacksonville, Florida 32202
Telephone: (904) 355-1700
Email: john.rogerson@arlaw.com
jamie.olino@arlaw.com

Michael S. Neiburg
Joseph M. Mulvihill
YOUNG CONAWAY STARGATT &
TAYLOR, LLP
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
CM/ECF Noticing: bankfilings@ycst.com
Email: mneiburg@ycst.com
jmulvihill@ycst.com

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include Renovate America, Inc. (4352) and Personal Energy Finance, Inc. (9209). The Debtors’ service address is 16870 W. Bernardo Dr., Suite 408, San Diego, California 92127.

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or given with regard to the above-referenced case and the proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed as (a) a consent by St. John & Partners Advertising and Public Relations, Inc. to the jurisdiction of the Court or any other court with respect to proceedings, if any, commenced in any case against or otherwise involving St. John & Partners Advertising and Public Relations, Inc. or (b) a waiver of any right of St. John & Partners Advertising and Public Relations, Inc. (i) to have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related hereto; (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) to other rights, claims, actions, defenses, setoffs, or recoupments to which St. John & Partners Advertising and Public Relations, Inc. is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved hereby. This Notice of Appearance shall not be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: December 29, 2020
Wilmington, DE

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Joseph M. Mulvihill

Michael S. Neiburg (No. 5275)
Joseph M. Mulvihill (No. 6061)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Email: mneiburg@ycst.com
jmulvihill@ycst.com

-and-

John T. Rogerson, III (*pro hac vice pending*)
Jamie W. Olinto (*pro hac vice pending*)
ADAMS AND REESE LLP
501 Riverside Avenue, Suite 601
Jacksonville, Florida 32202
Telephone: (904) 355-1700
Email: john.rogerson@arlaw.com
jamie.olinto@arlaw.com

*Counsel to St. John & Partners Advertising and
Public Relations, Inc.*